

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ROBERT BERG,
Plaintiff,

vs.

M&F WESTERN PRODUCTS, INC.,
Defendant.

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Case No. 6:19-cv-418-JDK

PROPOSED VOIR DIRE QUESTIONS

Pursuant to the Court's First Amended Scheduling Order (Dkt. 20), the Parties respectfully submit the following *voir dire* questions.¹

1. Have any of you heard or read anything about this case? What do you know?
2. The Plaintiff in this case is Robert Berg. Have you or anyone close to you ever worked for or had a business relationship with one of the plaintiffs?
3. The Defendant in this case is M & F Western Products, Inc. Have you or anyone close to you ever worked for or had a business relationship with the Defendant or any of its partners/affiliates?
4. I have provided you with a list of the attorneys and law firms who may be involved in the trial. Do you know, or know of, any of these attorneys or law firms?
5. I have provided you with a list of people who may testify or be mentioned at trial. Do you know, or know of, any of these people?
6. Has anyone ever been accused of copyright infringement, either in a lawsuit or otherwise?
7. Does anyone own a copyright? If so, have you ever accused someone else of infringing your copyright, either by filing a lawsuit or otherwise? If so, please

¹ The Parties jointly submit and agree upon Proposed Voir Dire questions Nos. 1-8 and 11-12. Plaintiff proposes questions Nos. 9-10, which M&F Western does not join.

explain.

8. Has anyone created jewelry designs or owned a jewelry or garment business?
9. Has anyone ever purchased western style jewelry including a cross pendent?
10. Is anyone originally from Texas?
11. Have you ever been a plaintiff in a civil lawsuit? If so, were you satisfied with the outcome? Please explain.
12. Have you ever been a defendant in a civil lawsuit? If so, were you satisfied with the outcome? Please explain.

Dated: November 24, 2020

By: /s/richardliebowitz/

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